

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TONY KOLE and GHOST INDUSTRIES, LLC,)
an Illinois limited liability company,)
)
)
Plaintiffs,)
) Case No. 11 CV 3871
v.)
)
)
VILLAGE OF NORRIDGE, an Illinois municipal)
corporation,)
)
)
Defendant.)

MOTION FOR PRELIMINARY INJUNCTION

NOW COME the Plaintiffs, Tony Kole and Ghost industries, LLC, an Illinois limited liability company, and, and move for the entry of an order:

1. Preliminarily enjoining Defendants, their officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction, from enforcing Sections 22-362, 22-363.B.2.e. and/or 22-364.G. of Ordinance No. 1785-13 - “An Ordinance Repealing and Reenacting Chapter 22, Article VIII, and Amending Chapter 38, Section 22 of the Revised Municipal Code of the Village of Norridge - 2002 An Ordinance Reenacting Weapons Dealers Licensing and Amending Associated Fees and Penalties”” which was adopted on or about December 11, 2013 (hereinafter “the New Ordinance”), a copy of which is attached hereto, against the Plaintiffs;

2. Preliminarily enjoining Defendant, its officers, agents, servants, employees, and all persons in active concert or participation with them who receive actual notice of the injunction, from enforcing any Village of Norridge Ordinance, or provision of the Ultra Vires

Agreement (attached hereto) which prohibits or unfairly inhibits Plaintiffs from operating as a Weapons Dealer in the Village of Norridge;

3. A Memorandum in Support of this Motion will be filed at or near the time of the filing of this Motion.

Dated: June 12, 2014

Respectfully submitted,

By: /s/David G. Sigale
David G. Sigale

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On June 12, 2014, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale

Attorney for Plaintiffs

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